

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
JOHNSTOWN DIVISION

In re:	<b>Bankruptcy 24-70091-JAD</b>
<b>Cheri E Morgan</b>	<b>Chapter 13</b>
Debtor,	<b>Related Doc. No. 35 and 43</b>
<b>Cheri E Morgan</b>	
Objecting Party	
v.	
<b>Statebridge Company, LLC,</b>	
Respondents.	

**STIPULATION RESOLVING DEBTOR’S OBJECTION TO CLAIM (DE #35) AND  
DISMISSING DEBTOR’S ADVERSARY CASE 24-07006**

This Stipulation Resolving Debtor’s Objection to Claim (DE #35) and Dismissing Debtor’s Adversary Case 24-07006 (“Objections”) is entered by and between Statebridge Company, LLC (“Secured Creditor”), by and through its attorneys of record, Robertson, Anschutz, Schneid, Crane & Partners, PLLC, and Cheri E Morgan (“Debtor”), by and through their respective attorney of record, James M. McClure, Esq. , Secured Creditor and Debtor are collectively sometimes referred to herein as the “Parties.”

**RECITALS**

1. Debtor, Cheri E Morgan (“Debtor”), filed the instant Chapter 13 Petition on March 11, 2024.
2. Secured Creditor timely filed its Proof of Claim on May 20, 2023 as Claim Number 5-1.
3. On August 15, 2024, Debtor filed an Objection, asserting allegations opposing Secured Creditor’s claim (DE# 35).
4. On August 15, 2024, Debtor Filed Adversary case 24-07006 to Determine Extent of Lien.

**THE PARTIES STIPULATE AS FOLLOWS:**

1. This Stipulation shall resolve Debtor's Adversary Complaint in Debtor's Adversary Case 24-07006;
2. Secured Creditor has agreed to accept \$19,000.00 in full satisfaction of the Secured Creditor's Proof of Claim.
3. The \$19,000.00 will be paid through the remainder of the Chapter 13 plan which Debtor shall cause to be amended subject to approval by the Chapter 13 Trustee;
4. Upon entry of the Stipulation, the Adversary Complaint will be voluntarily dismissed without prejudice;
5. Further, with such approval of the within Stipulation, the Debtor's Objection to Claim is resolved and the hearing scheduled for November 5, 2024 at 11:00 AM on the Parties' respective Objection is hereby cancelled.
6. If the Chapter 13 case is dismissed, converted to Chapter 7, or if the subject property is sold prior to discharge in the Chapter 13 case, this agreement will be void, and the entire balance of the original claim will be reinstated with any payments received being credited toward the original balance.
7. The Parties agree to the form, substance and provisions of this Stipulation and request the Court to Approve the same.

**IT IS SO STIPULATED:**

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

Date: 10/29/2024

By: /s/ Michelle L. McGowan  
Michelle L. McGowan, Esquire  
13010 Morris Rd., Suite 450  
Alpharetta, GA 30004  
Telephone: 817-873-3080  
Email: mimcgowan@raslg.com  
*Attorney for Secured Creditor*

Date: 10/25/2024

By: /s/ James M. McClure  
James M. McClure  
BMZ Law  
113 4th Street  
Huntingdon, PA 16652  
814-643-3555  
Fax : 814-643-1173  
Email: jmcclure@bmzlaw.com  
*Attorney for Debtor*

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Respondents.	

**ORDER APPROVING STIPULATION RESOLVING DEBTOR'S OBJECTION TO  
CLAIM (DE #35) AND DISMISSING DEBTOR'S ADVERSARY CASE 24-07006**

AND NOW, this 31st day of October, 2024, upon consideration of the Stipulation entered into by counsel for Statebridge Company, LLC and the Debtor, Cheri E Morgan, it is hereby ORDERED, ADJUDGED, and DECREED that the terms of the foregoing Stipulation are hereby approved in their entirety.

BY THE COURT:



Hon. Jeffery A. Deller  
U.S. Bankruptcy Court Judge

sjk

FILED  
10/31/24 3:44 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

In re:  
Cheri E Morgan  
Debtor

Case No. 24-70091-JAD  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0315-7  
Date Rcvd: Oct 31, 2024

User: auto  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 02, 2024:

Recip ID	Recipient Name and Address
db	+ Cheri E Morgan, 230 France Street, Sproul, PA 16682-8106

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 02, 2024

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 31, 2024 at the address(es) listed below:

Name	Email Address
Denise Carlon	on behalf of Creditor Wilmington Savings Fund Society FSB, not in its individual capacity, but solely as Legal Title Trustee for BCAT 2019-22TT dcarlon@kmlawgroup.com
James M. McClure	on behalf of Plaintiff Cheri E Morgan jmccclure@bmzlaw.com slash@bmzlaw.com;calbright@bmzlaw.com
James M. McClure	on behalf of Debtor Cheri E Morgan jmccclure@bmzlaw.com slash@bmzlaw.com;calbright@bmzlaw.com
Michelle L. McGowan	on behalf of Creditor STATEBRIDGE COMPANY LLC mimcgowan@raslg.com
Michelle L. McGowan	on behalf of Defendant Wilmington Savings Fund Society FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III c/o Statebridge Company, LLC mimcgowan@raslg.com

District/off: 0315-7

User: auto

Page 2 of 2

Date Rcvd: Oct 31, 2024

Form ID: pdf900

Total Noticed: 1

Office of the United States Trustee

ustpregion03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteewdpa.com

TOTAL: 7